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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

PROSPECT MEDICAL, P.C., PREMIER HEALTH CENTER, P.C., SHORE SPINE CENTER & PHYSICAL REHABILITATION, P.C. D/B/A NORTHEAST SPINE AND SPORTS MEDICINE, and NORTHEASTERN SPINAL HEALTH & REHABILITATION, LLC, on behalf of themselves and others similarly situated,

Plaintiffs,

VS.

CIGNA CORPORATION, CONNECTICUT GENERAL LIFE INSURANCE COMPANY, AND CIGNA HEALTHCARE,

Defendants.

Document Electronically Filed

Civil Action No.: 09-5912 (SRC) (MAS)

CERTIFICATION OF E. EVANS WOHLFORTH, JR. IN SUPPORT OF MOTION TO DISMISS THE THIRD AMENDED CLASS ACTION COMPLAINT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(C)

I, E. EVANS WOHLFORTH, JR., of full age, hereby certify as follows:

- 1. I am an attorney at law of the State of New Jersey and a member in good standing of the bar of this Court. I am a member of the law firm of Gibbons P.C., counsel for Defendant Connecticut General Life Insurance Company ("CGLIC") in this matter.
- 2. I submit this Certification in support of CGLIC's Motion to Dismiss the Third Amended Class Action Complaint Pursuant to Federal Rule of Civil Procedure 12(c).

3. Attached hereto as **Exhibit A** is a true and correct copy of the First Amended

Complaint filed in Advanced Rehabilitation, LLC, et al. v. UnitedHealthGroup, Inc., Civ. No.

10-00263 (D.N.J.).on May 18, 2010.

4. Attached hereto as **Exhibit B** is a true and correct copy of the Hon. Dennis M.

Cavanaugh's March 17, 2011 Opinion in Advanced Rehabilitation, LLC, et al. v.

UnitedHealthGroup, Inc., Civ. No. 10-00263 (D.N.J.).

5. Attached hereto as **Exhibit C** is a true and correct copy of the Hon. Dennis M.

Cavanaugh's October 31, 2011 Opinion in Advanced Rehabilitation, LLC, et al. v.

UnitedHealthGroup, Inc., Civ. No. 10-00263 (D.N.J.).

6. Attached hereto as **Exhibit D** is a true and correct copy of the Third Amended

Class Action Complaint filed in this matter on February 24, 2011 (ECF No. 50).

7. Attached hereto as **Exhibit E** is a true and correct copy of the Proposed Second

Amended Class Action Complaint filed in Advanced Rehabilitation, LLC, et al. v.

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UnitedHealthGroup, Inc., Civ. No. 10-00263 (D.N.J.) on March 31, 2011.

I certify under penalty of perjury that the foregoing is true and correct. Executed in

Newark, New Jersey on December 18, 2012.

E. Evans Wohlforth, Jr.

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Dated:

December 18, 2013

Newark, New Jersey